UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : NO.

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:

TRAYVON M. THOMAS.

v.

Defendant

Delendant .

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1

On or about January 11, 2013, at a place within the special maritime and territorial jurisdiction of the United States, namely the United States Penitentiary at Canaan, Pennsylvania, on land acquired for the use of the United States and under its concurrent jurisdiction, the Defendant,

TRAYVON M. THOMAS,

did unlawfully kill a human being, Ephraim Goitom, without malice, in the commission of a lawful act in an unlawful manner which might produce death. Such act was committed in a grossly negligent manner, with actual knowledge that his conduct was a threat to the life of another and with actual knowledge that would reasonably enable him to foresee the peril to which his act might subject another, to wit: Trayvon M. Thomas did unlawfully kill Ephraim Goitom, by acting in self-defense after Ephraim Goitam had attacked and struck him with a mace type weapon, by further acting in a grossly negligent manner by brandishing a sharpened weapon and excessively defending himself by stabbing at Ephraim Goitom after they both fell to the floor and did thereby commit the crime of involuntary manslaughter.

In violation of Title 18, United States Code, Sections 1112.

THE UNITED STATES ATTORNEY FURTHER CHARGES:

COUNT 2

On or about January 11, 2013, at the United States Penitentiary at Canaan, Pennsylvania, in the Middle District of Pennsylvania, and within the jurisdiction of this Court, the Defendant,

TRAYVON M. THOMAS,

an inmate of the United States Penitentiary at Canaan, Pennsylvania, knowingly possessed a prohibited object, that is, a sharpened weapon commonly known as a "shank."

In violation of Title 18, United States Code, Sections 1791(a)(2).

PETER J. SMITH

UNITED STATES ATTORNEY